PD-0553-20 COURT OF CRIMINAL APPEALS AUSTIN, TEXAS Transmitted 3/18/2021 3:46 PM Accepted 3/19/2021 8:19 AM DEANA WILLIAMSON CLERK

# No. PD-0553-20

In the

Texas Court of Criminal Appeals
At Austin

FILED COURT OF CRIMINAL APPEALS 3/19/2021 DEANA WILLIAMSON, CLERK

### No. 01-18-00897-CR

In the

Court of Appeals for the First District of Texas At Houston

## ——♦—— No. 1532340

In the 178th District Court Of Harris County, Texas

## JAMAILE JOHNSON

Appellant V.

### THE STATE OF TEXAS

Appellee

# STATE'S MOTION FOR LEAVE TO FILE REPLY BRIEF

#### KIM OGG

District Attorney Harris County, Texas

#### PATRICIA MCLEAN

Assistant District Attorney Harris County, Texas 500 Jefferson Houston, Texas 77002

Tel.: 713-274-5826

FAX No.: 832-927-0180 Counsel for the State of Texas Pursuant to Tex. R. App. P. 70.4, the State of Texas asks for leave to file a reply brief to appellant's brief on discretionary review. The State's reply brief does not raise any additional points, but appellant's brief on the merits has raised points that merit a response. The State's reply brief is 786 words. The case is set for submission on March 17, 2021. The State believes this brief will aid the court in its decisional process and will not result in any delay to the case.

The State asks this Court to accept and file the State's reply brief, which was submitted via e-file on March 18, 2021.

Respectfully submitted,

/s/ Patricia McLean

PATRICIA MCLEAN
Assistant District Attorney
Harris County, Texas
500 Jefferson
Houston, Texas 77002
(713) 274-5826
TBC No. 24081687
mclean\_patricia@dao.hctx.net

## **CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing instrument has been sent to the following email addresses via e-filing:

Windi Pastorini Attorney for Appellant windi@pastorinilaw.com winlaw@swbell.net

Stacey Soule State Prosecuting Attorney information@spa.texas.gov

/s/ Patricia McLean

PATRICIA MCLEAN
Assistant District Attorney
Harris County, Texas
500 Jefferson
Houston, Texas 77002
Tel: 713-274-5826

FAX No.: 832-927-0180 TBC No. 24081687

mclean\_patricia@dao.hctx.net

Date: March 18, 2021

### **Automated Certificate of eService**

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Patricia McLean Bar No. 24081687 Mclean\_Patricia@dao.hctx.net Envelope ID: 51614495 Status as of 3/19/2021 8:19 AM CST

Associated Case Party: State of Texas

Name	BarNumber	Email	TimestampSubmitted	Status
Stacey Soule	24031632	information@spa.texas.gov	3/18/2021 3:46:09 PM	SENT

Associated Case Party: Jamaile Johnson

Name	BarNumber	Email	TimestampSubmitted	Status
Winifred Pastorini	962500	Windi@pastorinilaw.com	3/18/2021 3:46:09 PM	SENT
Windi Pastorini		winlaw@swbell.net	3/18/2021 3:46:09 PM	SENT